



ENERGY AND ENVIRONMENT CABINET

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Governor

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Secretary

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Commissioner

January 6, 2016

Ms. Tracey Duncan
US Department of Energy
Portsmouth/Paducah Project Site Office
5501 Hobbs Road
Paducah, Kentucky 42053

RE: Water Policy Area Screening Study Report for the Five-Year Review of Remedial Actions (DOE/LX/07-1289&D2/R1/AI)
Paducah Site
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Duncan:

The Division of Waste Management (Division) has completed its review of the subject document. Please find the Division's comments on the document as an attachment. If you have any questions or require additional information, please contact Mike Guffey at (502) 564-6716, ext. 4698 or e-mail at mike.guffey@ky.gov.

Sincerely,

A handwritten signature in black ink that reads "April J. Webb".

April J. Webb, P.E., Manager
Hazardous Waste Branch

AJW/bb/mg/lww

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DWM File #730; TEMPO: ARM20150006 (5-Year Review for Remedial Actions –

Water Policy Area Screening Study Report)

Attachment: Kentucky Comments

**Kentucky Division of Waste Management's Comments on the
Water Policy Area Screening Study Report for the Five-Year Review of Remedial Actions
Paducah Site, Paducah, Kentucky
DOE/LX/07-1289&D2/R1/A1
January 4, 2016**

Specific Comments:

1. Figure 1 Vapor Intrusion Boring Locations, Page 2:

Please use the most recent TCE groundwater plume interpretation available and specify the year. The lowest concentration depicted on both TCE plume figures is 5.0 µg/L; whereas the default VISL screening value for TCE is 1.2 µg/L. Please add a concentration field to account for any available data that is <5.0 µg/L. Kentucky is aware that the number of control points are likely not sufficient to confidently place a 1.0 µg/L TCE contour; however, Kentucky believes that detectable concentrations of TCE should be depicted whenever available. If DOE finds it necessary to place a qualifying statement on the map to inform the reader that the contour interval is not supported by sufficient control points, then please do so. Consider depicting the 1.0 µg/L contour interval as a dashed line with no color representation, like that presented in draft form during a 2015 meeting in Nashville. If there are circumstances or reasons why DOE does not want to depict 1.0 µg/L TCE concentrations on a map, Kentucky will consider those on an individual basis, but would prefer the default TCE plume maps to depict the 1.0 µg/L contour moving forward. Also, the term Water Policy is referenced numerous times in this report; however, it is not depicted in any of the reports figures. Please add the Water Policy boundary to the appropriate figures.

2. Section 1.3 Project Approach, Page 3:

Please consider adding text to clarify why certain residential properties were chosen in the Water Policy Box and others were not. Also consider adding a statement regarding the FFA parties desire to collect the samples as close as physically possible to the occupied residential living spaces. The clarifications being requested for consideration are adequately captured in the Executive Summary and may be considered as an unnecessary change to this section.

3. Section 1.7 Project Conceptual Site Model, Page 5:

“The SAP presented the results of historical investigations that indicate that the UCRS soils in the vicinity of the Paducah Site have very low permeability and do not show evidence of vapor migration at concentrations that would cause soil gas in the vicinity of these residences to exceed VISL values.” The link between historical investigations (presented

in the SAP) not showing evidence of vapor migration at 1.2 µg/L (VISL Values) is misleading. Historical investigations were not conducted to link UCRS soils in the vicinity of the Paducah Site to the vicinity of these residences. Please change this sentence.

4. References, Page 21:

The September 30, 2014 EPA letter to DOE was signed by Randall Chaffins and cited as being a letter authored by Jennifer Tufts. For clarity, please include R. Chaffins as the author.

- - End of Kentucky Comments - -